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\*<sup>Δ</sup> MEMBER PA, NJ AND NY BAR

May 16, 2023

**Via Electronic Court Filing**

Hon. Louis S. Stanton  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: Jane Doe v. Solebury School, *et al.*  
Case No. 1:21-cv-6792

Dear Judge Stanton,

I represent the Plaintiff, Jane Doe, in the matter of *Jane Doe v. Solebury School, et al.* In accordance with Local Rule 37.2, please accept this letter requesting a pre-motion discovery conference regarding the following issues.

Briefly, this lawsuit arises from acts of sexual abuse and negligent supervision that Plaintiff alleges occurred while she was a student at the Solebury School.

In its Fed. R. Civ. 26(a)(1) initial disclosures, Defendant Solebury School indicated that it possessed a “Bucks County Grand Jury Report” that supported its claims or defenses. While Defendant Solebury School produced the Bucks County Grand Jury Report, this document further indicates that the Solebury School had provided the Bucks County Grand Jury with “875 documents” regarding allegations of sexual abuse that occurred at the school. The Bucks County Grand Jury Report makes multiple references to these “875 documents” in its findings.

Plaintiff made several good faith attempts to obtain these records. Specifically, I spoke with Defendant Solebury School’s counsel on telephone regarding this request on several occasions. I also conveyed this request in a letter dated April 20, 2023 and an email dated May 11, 2023. Nevertheless, Defendant Solebury School has not produced these “875 documents” or even asserted an evidentiary basis for withholding these documents.

We respectfully believe that Defendant Solebury School should be compelled to provide us with copies of the “875 documents” that it previously provided to the Bucks County Grand Jury. As recognized by Defendant Solebury School, the Bucks County Grand Jury Report is relevant and discoverable. The “875 documents” provided by Defendant Solebury School to the Bucks County Grand Jury, and which formed a basis for the findings contained within that report, are similarly relevant and discoverable, and should be produced.

Plaintiff scheduled the deposition of John Brown for June 15, 2023. Mr. Brown is a key witness in this matter, and Plaintiff's timely receipt of the "875 documents" is necessary for the preparation of this deposition.

Accordingly, we kindly request a pre-motion discovery conference so that these documents can be produced ahead of this scheduled deposition.

We thank you for your time and attention to this matter.

Very truly yours,

SOLOFF & ZERVANOS, P.C.

*John N. Zervanos*

By: JOHN N. ZERVANOS, ESQUIRE

CC: Via E-Mail and ECF  
Harold L. Moroknek, Esq. (counsel for Solebury School)  
Jennifer A. Robinson, Esq. (counsel for Solebury School)  
Ryan Michael Jerome, Esq. (counsel for Solebury School)  
Michael Engle, Esq. (counsel for John Brown)